

## **REMARKS**

Claims 1-17 and 19-24 are pending in the present application. Claims 18 and 25-30 have been cancelled. Claims 1, 5-8, 10-17, 19, and 23-24 have been amended. Reconsideration and allowance of the pending claims is respectfully requested.

### **I. Objections to Claims**

With regard to the claim objections, Applicant respectfully submits that Claims 5, 7-8, 10-11, 13-17, 23, and 24 have been amended in accordance with the Examiner's suggestions. In claim 5, "the activation" has been amended to "activation." In claims 7-8, 10-11, and 13-17, the phrase "the step of" has been deleted. In claim 23, "the deliver" has been amended to "delivery." In claim 24, "the state" has been amended to read "a state."

It is believed that the claim objections have been overcome.

### **II. 35 U.S.C. § 103, Obviousness**

The Examiner has rejected claims 1-13, 16-17, 19, and 25-28 under 35 U.S.C. § 103 (a) as being unpatentable over Smith (U.S. Patent No. 5,466,158) in view of Ho (U.S. Patent No. 6,064,855).

Additionally, the following claims were also rejected under 35 U.S.C. § 103 (a): Claim 14 was rejected over Smith, as modified by Ho, and further in view of Eberhard et al. (U.S. Patent No. 6,331,867); Claims 15 and 29 were rejected over the combination of Smith and Ho, and further in view of Tan (U.S. Patent No. 5,897,324); Claims 13 and 30 were rejected over Smith and Ho, in view of Chombo (U.S. Patent No. 6,313,828); Claim 23 was rejected over the combination of Smith and Ho, and further in view of Sharpe et al. (U.S. Patent No. 5,851,119); and Claim 24 was rejected over Smith and Ho, in view of Rallison et al. (U.S. Patent No. 5,991,085).

The foregoing rejections are respectfully traversed for the reasons outlined below.

With respect to independent claim 1, Applicant has amended this claim such that the magnetic signature sensor is predisposed to detect *and make direct contact* with the magnetic signatures on the pages as they are turned by a user viewing the book, wherein

the reading controller is adapted to interact with the magnetic signature sensor to determine the given page that the user is viewing *responsive to the direct contact between the magnetic signature sensor and the magnetic signature on the given page*. (Support for this amendment is found on Page 11, lines 3-17 of the specification.) As stated by the Examiner, Smith fails to teach the inclusion of magnetic signatures and magnetic sensors in its interactive book device. The Examiner has cited Ho in an attempt to cure the deficiencies of Smith. However, Applicant respectfully submits that Ho fails to teach a reading controller that is adapted to interact with a magnetic signature sensor to *determine a given page that said user is viewing responsive to said direct contact between said magnetic signature sensor and said magnetic signature on said given page*.

Specifically, on Page 4 of the Office Action, the Examiner states that "Ho teaches that some of the pages include magnetic signatures through a plurality of magnetic field generators 75 that are mounted on the bottom sides of the tab members 131 of the pages." First, responsive to the Examiner's comments in the Office Action, Applicant respectfully points out that Ho describes magnetic *field* generators mounted on tab members. Magnetic field sensors detect *magnetic fields* generated from the magnetic field generators. Ho merely relies on a detection of magnetic fields. There is no direct contact made between the magnetic field sensors and the magnetic field generators.

The Ho reference teaches that when a particular page is turned over, its corresponding tab member is also turned over, leaving the magnetic field undetected by the sensor. It is in the absence of magnetic field detection that the audio means in Ho reacts to determine the page and broadcast sound (Column 5, lines 39-56). The present invention, however, utilizes a reading controller to determine viewed pages *responsive to the direct contact between the magnetic signature sensor and the magnetic signatures on the viewed page*, not in the absence of contact.

Second, during the telephone conversation of July 5, 2002, in which Applicant's representative spoke with the Examiner, the Examiner claimed that the mechanical contact switches 71' of Ho renders obvious Claims 1, 6, and 19 of the present invention. Applicant respectfully submits that this embodiment (described in Column 6, lines 4-26 of Ho) also fails to teach, suggest, or render obvious Claims 1, 6, and 19, as amended. Ho describes a plurality of mechanical switches that are mounted on the device and tab

members that are attached to each page of the voice book (Figure 7). When the voice book is closed, all of the tab members are in contact with the mechanical switches and the audio means is deactivated. No pages are detected. However, when the voice book is open to a certain page (for example, the fifth page), the preceding pages (pages 1-4) are turned down so that *the mechanical switch does not contact the tab member of the certain (fifth) page*. The detecting mechanism then detects that the user is reading the certain fifth page based on the *absence of contact* between that page's tab member and the mechanical switch. Therefore, since the present invention teaches determination of the page being viewed responsive to the direct contact between a magnetic signature sensor and a magnetic signature *on the page*, and since Ho teaches detection of a given page based on non-contact, Applicant respectfully submits that Ho teaches away from the present invention. In view of the foregoing discussion, it is believed that Claim 1 is allowable. It is further believed that all claims dependent upon Claim are allowable for at least the reasons discussed above with respect to Claim 1. Therefore, reconsideration of independent Claim1, and all claim dependent therefrom, is respectfully requested.

With regard to independent Claim 6, Applicant has similarly amended the step of detecting so that it now recites, among other things, the steps of: 1) *creating direct contact* with the specified locations of a given magnetic signature on a given page of said pages by utilizing the reading elements of the magnetic signature sensor; and 2) correlating the specified location of the given magnetic signature on the given page with stored audio representations related to the illustrations and/or text of the given page. Likewise, independent Claim 19 has also been amended such that the magnetic signature sensor is predisposed to detect *and make direct contact with* the magnetic signatures on the pages of a book as the pages are turned by a user viewing the book and the reading controller is adapted to interact with the magnetic signature sensor in order to determine the given page or pages that the user is viewing responsive to the direct contact between the magnetic signatures on the given page or pages and the magnetic signature sensor. Applicant respectfully submits that amended Claims 6 and 19, and all claims dependent therefrom, are allowable for at least the reasons discussed above with respect to Claim 1. Reconsideration of independent Claims 6 and 19, and all claims dependent therefrom, is respectfully requested.

With respect to independent Claim 12, Applicant has amended this claim to include the limitations of dependent Claim 18, and has therefore cancelled the latter claim. In the Office Action, the Examiner rejected Claim 18 based on the combination of Smith and Ho, in view of Chombo. Applicant believes that independent Claim 12, as amended, nevertheless overcomes this combination of references. The amended portion of Claim 12 is as follows:

*...downloading a duplicate of said electronic equivalent representations stored in said first electronic memory space into a second electronic memory space housed within said electronic book reader system, said downloaded duplicate of said electronic equivalent representations stored in said second electronic memory space according to pages of said electronic book reader system.*

Support for the above amendment is found on Page 13, lines 12-17 of the specification. As cited by the Examiner, Smith and Ho fail to teach or suggest the step of downloading a duplicate of the electronic equivalent representations into a second memory space. The Chombo reference describes a general storing of information from a compact disk to a RAM memory (Column 7, lines 33-36). Chombo however fails to show the downloading and storing of electronic equivalent representations based on the pages of the book. Applicant submits that the combination of Smith, Ho, and Chombo fails to teach, suggest, or render obvious Claim 12 of the present invention. Therefore, independent Claim 12, and all claims dependent therefrom, are deemed allowable for at least the reasons discussed above. Reconsideration of Claim 12 is respectfully requested.

With regard to the Examiner's rejection of Claims 15 and 29, Applicant submits that Claim 15 is dependent upon Claim 12, and is therefore allowable for at least the reasons discussed above with respect to Claim 12. Reconsideration of Claim 15 is respectfully requested. Claim 29 has been cancelled and does not require consideration.

With regard to the rejection of Claims 18 and 30, Applicant points out that both claims have been cancelled.

With regard to the rejections of Claims 23 and 24, Applicant submits that these claims are dependent upon Claim 19, and are therefore allowable for at least the reasons

discussed above with respect to Claim 19. Reconsideration of Claims 23 and 24 is respectfully requested.

**VII. Conclusion**

It is respectfully urged that the subject application is patentable over the cited references and is now in condition for allowance.

The examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'DWC', is written over a horizontal line.

David W. Carstens  
Reg. No. 34,134  
Attorney for Applicant

Date: July 19, 2000  
CARSTENS, YEE & CAHOON, L.L.P.  
P.O. Box 802334  
Dallas, TX 75380  
(972) 367-2001 Telephone  
(972) 367-2002 Facsimile

## Appendix Showing Changes Made

1. (Amended) A system for illustrating sound and text comprising:
  - a book with pages including illustrations and/or text, at least some of said pages including a magnetic signature[s];
  - a book holder adapted to accept said book, said book holder having a reading surface with a magnetic signature sensor, cartridge slot, a reading controller, a speaker, and a power supply; and
  - a cartridge adapted to be inserted in said cartridge slot, said cartridge including stored audio representations related to said illustrations and/or text of said pages;
  - wherein said magnetic signature sensor is predisposed to detect and make direct contact with said magnetic signature[s] on said pages as they are turned by a user viewing said book, and wherein said reading controller is adapted to interact with said magnetic signature sensor to determine [what page or pages] a given page that said user is viewing responsive to said direct contact between said magnetic signature sensor and said magnetic signature on said given page, and to retrieve audio representations of illustrations and/or text stored on said cartridge corresponding to said page or pages being viewed by said user and to reproduce audible sounds related to said retrieved audio representations through said speaker for listening by said user.
  
5. (Amended) The system according to Claim 1 wherein said power supply is communicably coupled with said reading controller and said speaker, said power supply further adapted to control [the] activation and de-activation of said book holder.

6. (Amended) A method for illustrating sound and text utilizing a book holder including a reading controller, a speaker, and a magnetic signature sensor with one or more reading elements, said book holder adapted to accept a book with pages including illustrations and/or text, at least some of said pages including magnetic signatures, the method comprising the steps of:
- attaching said magnetic signatures in a specified location on said pages;
  - [detecting] creating contact with the specified location[s] of [said] a given magnetic signature[s] on a given page of said pages by utilizing said reading elements of said magnetic signature sensor;
  - correlating said specified location[s] of said given magnetic signature on said given page with stored audio representations related to said illustrations and/or text of said given page[s]; and
  - delivering audible sounds corresponding to said stored audio representations via said speaker to accompany the illustrations and/or text on said given page [or pages].
7. (Amended) The method according to Claim 6 wherein said attaching step is followed by [the step of] placing said book on said book holder in a position wherein said magnetic signatures on said pages of said book are properly aligned with said reading elements of said magnetic signature sensor.
8. (Amended) The method according to Claim 7 wherein said placing step is followed by [the step of] turning said pages of said book in order to view the illustrations and/or text therein.
10. (Amended) The method according to Claim 6 wherein said delivering step is preceded by [the step of] retrieving the stored audio representations of said illustrations and/or text retrieved corresponding to said page or pages being viewed by said user.
11. (Amended) The method according to Claim 10 wherein said retrieving step is followed by [the step of] reproducing the stored audio representations of said illustrations and/or text retrieved corresponding to said page or pages being viewed by said user.

12. (Amended) A method for electronically storing text and audio content for use in an electronic book reader system, the method comprising the steps of:  
creating electronic equivalent representations of said text and audio content; [and]  
storing said electronic equivalent representations in a first electronic memory space; and  
downloading a duplicate of said electronic equivalent representations stored in said first electronic memory space into a second electronic memory space housed within said electronic book reader system, said downloaded duplicate of said electronic equivalent representations stored in said second electronic memory space according to pages of said electronic book reader system.
13. (Amended) The method according to Claim 12 wherein said creating step further includes [the step of] recording sounds and/or words corresponding to illustrations and/or text of a book.
14. (Amended) The method according to Claim 12 wherein said storing step further includes [the step of] formatting said electronic equivalent representations into a digital format.
15. (Amended) The method according to Claim 12 wherein said storing step further includes [the step of] sorting said electronic equivalent representations into a plurality of addresses (e.g., A0, A1, A2...An) within said first electronic memory space.
16. (Amended) The method according to Claim 12 wherein said sorting step is followed by [the step of] packaging said electronic equivalent representations stored in said first electronic memory space utilizing a chip housed within a cartridge means.
17. (Amended) The method according to Claim 16 wherein said packaging step further includes [the step of] inserting said cartridge means into said electronic book reader system adapted to receive said cartridge means.



19. (Amended) An electronic book reader system for illustrating sound and text comprising:

a reading surface adapted to accept a book with pages, said pages including illustrations and/or text, at least some of said pages including magnetic signatures attached at specific locations;

a book support surface adjoined to one side of said reading surface, said book support surface adapted to support said page or pages viewed by a user;

a magnetic signature sensor including one or more individualized reading elements, said magnetic signature sensor predisposed to detect and make direct contact with said magnetic signatures on said pages as they are turned by said user viewing said book;

a bracket coupled to said reading surface adapted to hold said book in place while said page or pages are turned;

a reading controller adapted to interact with said magnetic signature sensor in order to determine [what] the given page or pages said user is viewing responsive to said direct contact between said magnetic signatures on the given page or pages and said magnetic signature sensor; and

a power supply communicably coupled with said reading controller adapted to activate and de-activate the functionality of said electronic book reader;

a cartridge slot within said electronic book reader adapted to receive a cartridge including stored audio representations related to said illustrations and/or text of said pages; and

a speaker communicably coupled with said reading controller adapted to deliver said audio representations for listening and reading along with said page or pages viewed by said user,

wherein said reading controller is adapted to retrieve and reproduce said audio representations of said illustrations and/or text stored on said cartridge corresponding to said page or pages being viewed by said user.

23. (Amended) The system according to Claim 19 wherein said reader further comprises a volume control adapted to control the volume of [the deliver] delivery of said audio representations for enjoyable listening by said user.

24. (Amended) The system according to Claim 19 wherein said power supply is coupled with a Light Emitting Diode (LED) indicator for determining [the] a state (e.g., On/Off) of said electronic book reader system.